

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA**
Brunswick DIVISION

2013 MAY -6 PM 2:53

Cadeef

[Enter the full name of the plaintiff in this section]

Seelia RobinsonZack Lyde
2509 Barlow St.
Bwks GA 31520PDB 60968Civil Action No. V213- 66Savannah, GA 31420

[to be assigned by Clerk]

v. The State of Georgia & . . .

[Enter the full name of each defendant in this action.
If possible, please list only one defendant per line.]Amity House & its Board of Directors
Jeffrey Arnold & misty Reanue - P.A. - Pinesville GAGlynn County Juvenile Court; Judge Rountree, Donita TaylorGlynn County DFCS, SAAG Jim Chamberlin & other DFCS employeesTri-County Protective Svcs - DirectorKidsnet of Glynn County
personnel - listedAmity House - Director - Mary HoganBobby Cagle - DHS -
child welfare directorInspector General of GA

Lt. Gov.

Secretary of State - GA

Cagle Jack Kingston

Carenet of Bwks - GAGA state US Attorney's Office
of GA - Jason NunezConsumer M.H. Network of GAGA Coalition
for Domestic AbuseConstituent
Srcs - DHS

↑ Sherry Jenkins Tucker

If allowed by statute, do you wish to have a trial by jury? Yes ☒ No ☐

[If any answer requires additional space, please use additional paper and attach hereto]

I. PREVIOUS LAWSUITS**A. Have you begun other lawsuits in state or federal court dealing with the same Facts involved in this action?**Yes ☒ No ☐

DHS - as a whole - they won't release names + organizations of all who have been involved in my case

GA State - State Accounting Office

DHR/DHS - Ann D. Pope

Previous DHS Commissioner - BJ Walker

DHS - ~~Ann~~ Deb Farrell

Governor's Office - Peggy Sorrells

Governor's Office - ~~CO~~ Office of the Child Advocate
Ayonna Johnson -

Women's Resource to end domestic
Liberty County Child Sppt Violence
& DA's Office

John Bassett - Housing Trust Fund
for the homeless

Dept. of Community Affairs

~~Legal Aid - Buck + Atlanta~~

NAMI - GA

SAMHSA - GA

Mental Health America for Georgia

Dept. of Community Health - GA

Jeannette Bacon

* There are others by way of: DHS, DCA,
Secretary of State - GA, HHS/Civil Rights/HIPAA
ProBono Legal Svcs - Atlanta
Southern Ctr. for Human Rights

Chatam County DFCS Liberty County - CASA

Liberty County DFCS

Gabriel's House - Owner J. Dsteen & staff -

Tammy Kersey - "Ms. Janice"

Statesboro - County DFCS

Statesboro - Joseph's Home For Boys

Camden County DFCS

Casa - Camden County

Casa - Glynn County

Serenity House Liberty

Safe Harbor - Glynn County

Constituent Sres - DHS - Yvonne Davenport,

Patricia Holloway etc. . . .

Commissioner Clyde L. Reese - DHS - & other employees

HHS - Hipra / Civil Rights - Roosevelt Freeman

GA - Office for State Admn. Hearings

DHS - Family Violence Unit

Gateway BHS - Leigh Guy, Dr. Bonetti, Candy

Sheila Ford - Cepeda Moore Graham

"Dr." Cheryl McKenzie, Mary King

"Amy" 7 counselors, Barbara Meyers,

Transitional Child Care Staff

"Judy" counselor, Pam, Cherelle, Susan Goodman

"Kelli", Leigh Melton & others

Greg Gindan - Glynn County Head Social worker

Sloane Malloy - counselor - Glynn Middle School

Attorney's Glynn County

Alex Atwood

Ernest Gilbert

Audrey Chapman

Frances Dyal

John Price

B. If your answer to A is Yes, describe the lawsuit in the space below. [If more than one lawsuit, describe on another sheet using the same outline.]

1. Parties to this lawsuit:

Plaintiff: Scelia Robinson

Defendant: Gateway BHS

2. Court: Brunswick - magistrates
(If federal court, name the district; if state court, name the county)

3. Docket Number: 0902887 - 1002154

4. Name(s) of Judge(s) to whom case was assigned: Morgan

5. Status of Case: Dismissed - & refused to send it
(For example, was the case dismissed? Settled? Appealed? Still Pending?)
to the right venue

6. Date lawsuit was filed: Aug. 2009

7. Date of disposition (if concluded): ?

C. Do you have any other lawsuit(s) pending in the federal court?

Yes No ✓

II. PARTIES

In Item A below, place your name and address in the space provided. [If additional plaintiffs, do the same on another sheet of paper.]

A. Name of Plaintiff: Scelia Robinson

Address: POB 60968 Savannah, GA 31420

In Item B below, place the full name of the defendant, and his/her/its address, in the space provided. Use Item C for additional defendants, if any.

B. Name of Defendant: Glynn County Juvenile Court - George Rountree

Address: 1707 Gloucester St. ↑ SAGE Jim Cham

A. Name of Plaintiff: Reverend Zack Lyde
2509 Bartow St.
Brunswick, GA 31520

C. **Additional Defendants** (provide the same information for each defendant as listed in Item B above):

Please see handwritten supplemental list
I would ask this court to please allow
me to add additional names of people
& organizations - as long as I do
not violate the process in which things
are done - thank you

III. **STATEMENT OF CLAIM**

State here, as briefly as possible, the facts of your case. Describe how each defendant is involved. Include also the name(s) of other persons involved, dates, and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Use as much space as you need. Attach extra sheets of paper if necessary.

Prosecutorial misconduct - please see attached
Professional misconduct - please see attached
Racial practices - prejudicial practices
See attached complaint - 4 typed pgs.
False Claims Act

III. STATEMENT OF CLAIM - *continued.*

Please see typed - 4- pgs

Families are being abused by State CPS and Family Courts throughout the United States of America, this is a major issue that needs to be addressed, Families that have had their civil rights and judicial rights violated through family court proceedings and the fact that all due process and constitutional rights are violated and manipulated by family court judges, District Attorneys, and Commissioners of /social services departments as well as CPS workers, and court appointed attorneys, attorneys that are hired that do not work for the clients but have helped incriminate parents. Also of extreme interest, is obtaining names/phone/location of CPS workers, providers of all kinds who fall under DHS and are a part of DHS and HHS – other state agencies – who ignore - and who are falsifying or have falsified and or destroyed documents in court – for courts – outside of court and who have lied in a court setting. I am requesting – again – a full investigation of all departments, due to government entrapment. A suit is needed against the State of Georgia the case workers, family court judges, and district lawyers, state and federal agencies, DHS and its providers, hired attorneys, counselors, and medical personnel. This is about Judicial and Government accountability. The People of the State of Georgia and me - through discovery have found:

1. The imbalance of funding is creating corruption
2. Corruption has filtered through all manner of government and related agencies
3. Judicial decisions violate the public trust
4. Laws are created and passed that give parens patriae unlimited power not provided by the Constitution
5. The pendulum has swung to create a monopoly strategy of funding extracted from dwindling Social Services that have been set up to help families in need is devastating families across America and in the State of Georgia
6. Children's lives are at stake while in the care of government funded agencies, such as rape, sexual abuse, physical abuse and neglect, mental abuse, and statistics show our children are being killed while in government placements outside of the parental home/or relatives/fathers that have severe personal issues including mental health, unhealthy lifestyles, incarceration histories
7. That the state of Georgia are not following guidelines placing children with relatives but are screening them out using different criteria with foster families, or falsifying documents to entrap parents and not keeping the children in the home with parents but removing the children without due process or any true purpose other then to incriminate parents/family members and to insure family is unfit
8. That pockets of tyranny are going unchecked without recourse
9. Local government/Georgia State Government/ civil and family courts is not responsive to The People of the State of Georgia or to me and my family.
10. That The People of the State of Georgia and my family have been turned away from civil courts, and from family courts only to remain battered and bruised by the tyranny of these local government funded courts as the judges, case workers/commissioners and district attorneys mock the outraged parents and children of which they so willingly strip of their civil rights and liberties

The People of Georgia and I are declaring a public health crisis and human rights violation as well as their Civil rights are being stripped and taken from them and their families, as a result of these above atrocities and also In addition, The People of Georgia and I find the Parens Patriae to be more than a doctrine but a specialized position created by the government for the government that violates Article 1 Sec 9, 10: No title of nobility or honors shall be granted by the United States. The title extends to the courts, Childrens Administration and public education violating Amendment 14 depriving persons of life, liberty and property without due process. The position applies as a collective.

I am requesting an investigation of the departments as well as Juvenile court of Glynn County, Georgia. I am asking that all of the family court files, case files, court tapes, and videos pertaining to my case be put into the investigation, as well as there be a federal lockdown on all CPS and family courts so that no tampering of documents can be done by such agencies, the fact is family court documents will show the fact that they are mishandled and manipulated by these agencies to insure incriminating charges are inevitable and due process is not being carried out, civil rights are violated, all human rights are violated and the United States Constitution is not on the agenda of these agencies. The people of the United States of America and within the State of Georgia are being abused by these powers. There have been several years of abuse of power waste by the State of Georgia – the state has been investigated before and has been labeled to be the most corrupt state in our nation. Situations have occurred throughout the years in the state of Georgia with fraud, waste, and corruption even as late as 2011 when \$600,000 was stolen by DFCS workers, over 30 children killed in the custody of the state, and the most recent investigation on September 5, 2012 for fraud, abuse, waste, and fabricating and destroying documentation. The parents who have or had children in the custody of the state reported abuse against their children and the agencies covered it up and retaliated against the parents.

I am asking that the United District Court for the Southern District of Georgia – Brunswick Division provide an emergency injunctive relief, a cease and desist order, and a trial by jury. This relief is to stop the judicial and social services abuses that my family and I have suffered – as well as a Termination of Parental Rights. We, as a family have been tortured and traumatized. My children have suffered emotional, sexual, physical, spiritual, psychological, and medical abuse. I have been ambushed by the Glynn County Juvenile Court with “trials” that were staged and one-sided. The entire case has been prejudicial towards me and even to the point of making my children suffer in many ways – almost to the point of death, sexual advances, being told “that they will never come home” due to informing me of their maltreatment and because I reported and challenged the abuse and neglect by the Glynn County Juvenile Court, the agencies attached to DHS including DHS, the Federal agencies under HHS and the State of Georgia by way of the Governor’s Office and their internal departments. They all refuse to give me names and dates of all parties who have been involved at one point or another.

Venue is proper and the United District Court for the Southern District of Georgia – Brunswick has jurisdiction to hear the matter pursuant to 28 U.S.C. 1331 and the court as named – has supplemental jurisdiction pursuant to 28 U.S.C. 1367 to hear my state law claims because those claims are related to my federal claims and are inextricably entwined due to a host of distresses and the like – which are a result of the breaking of Federal laws and arise out of a common nucleus of related facts. My state law claims are related to my federal law claims such that those claims form part of the same controversy under Article III of the United States Constitution. I am bringing this suit in equity for deprivation of rights, privileges, and immunities secured by the Constitutional laws of the United States. This court has jurisdiction over this matter brought under 42 U.S.C. 1983 pursuant to 28 U.S.C. 1343(a)3.

Due to the types of crimes committed and because my suit is against the state of Georgia, its state and federal agencies I am asking that the United District Court for the Southern District of Georgia – Brunswick – waive the 11th Amendment referencing sovereign immunity by way of the Federal Torts Claim Act – U.S.C.A. §1346b, §2671-2678 and through the provisions of the Georgia Torts Claim Act. I am requesting this court of law to assist me and to enforce the state of Georgia – its departments, DHS, agencies attached to DHS, and federal agencies within the state of Georgia and the courts and it’s officials and attorneys involved to provide all necessary records per my request – as this request has been made on numerous occasions – but I was denied or ignored – that this enforcement be under the Rules and Regulations per HIPPA Law, under the state of Georgia and it’s laws, and under the Freedom of Information Act. In requesting these documents and other information prior to this suit – I did respectfully acknowledge that some information may be exempt.

The state of Georgia has willfully failed to and denied my right to have or access Family Preservation support thru its state and Federal entities. It has willfully failed to provide Family Preservation Support programs, Preventative programs, Intensive Family Preservation Services and willfully failed to follow and implement state, local, and federal policies and legislation.

Members and employees of this state under the named agencies in this petition did knowingly and willingly unlawfully harass, unlawfully surveillance, intimidate, manipulate, coerce us into participating and agreeing to conditions that were strictly for the benefit of the agencies, departments, and courts involved. I am asking for a Federal White Collar Case Discovery and Analysis (8.3-110) to be conducted on our behalf. Initially and repeatedly I had followed proper protocol to address the concerns by way of the chain of command for each entity involved and was denied or ignored – sometimes there would be an occasion of issues being “unfounded” – yet substantial evidence was present. I am asking this court to enforce 18 U.S.C. § 1961.

These are the violations that my family and I have suffered:

- ❖ order to pay an imposed debt or obligation termed child support in an attempt to maintain, establish and enforce service or labor or to otherwise impose a condition of involuntary servitude and peonage upon me with the intent to forcefully seize my personal earnings and property for an illegitimate purpose under the threat of fine, penalty or the threat of imprisonment for failure to comply facilitated by the named defendant's station and capacity of influence over local, state, and federal agencies and acting under state and federal law they did deprive me and my family of the federal right not to be held in a condition of involuntary servitude and peonage, and the federal right not be a victim of federal criminal offenses all to our detriment in violation of; Title 42 U.S.C. §1994, Title 18 U.S.C §1581, Title 18 §1584, Title 18 §241.
- ❖ severe emotional distress
- ❖ physical injury
- ❖ mental and spiritual anguish
- ❖ outrageous conduct
- ❖ willful and purposeful negligence
- ❖ abuse of process/willful and purposeful legal malpractice
- ❖ abuse of financial institutions
- ❖ healthcare fraud
- ❖ untruthful testimonies/deliberate falsehoods unrelated to the facts
- ❖ not implementing the Child Hearsay Statute
- ❖ ex parte communications
- ❖ intentional tortorious acts resulting in; interference with our persons, defamation of character, breach of confidentiality, privacy issues, malicious abuse of process, fraud, deceitful practices, criminal libel, civil libel, purposeful misrepresentation, blackmail, malfesance, non-feasance
- ❖ cruel and unusual punishment
- ❖ false arrest
- ❖ police profiling
- ❖ major conflicts of interests – friends, family, business partners etc...
- ❖ interference with employment
- ❖ force to be on psychotropic medications
- ❖ trickery and deviant schemes
- ❖ public humiliation
- ❖ exploitation

Additional violations of our Civil Rights are as follows: First, Fourth, Fifth, Sixth, Seventh, Eighth, Ninth, Thirteenth, and Fourteenth Amendments to the United States Constitution.

The Statutes that have been violated against us are as follows – O.C.G.A statutes will be added at a later time:

- ❖ 42 U.S.C. § 671(a)(15) Reasonable Efforts
- ❖ 42 U.S.C. § 671(a)(19) Relative Placement
- ❖ Title 18, U.S.C., Section 241 Conspiracy Against Rights
- ❖ Title 18, U.S.C., Section 245 Federally Protected Activities
- ❖ Title 18, U.S.C., Section 1001 Fraud and False Statements Part I Chapter 47
- ❖ 18 USC Sec. 1203 Title 18 Part I Chapter 55
- ❖ US Code Title 18 Part I Chapter 63 Section 1346
- ❖ Title 18 - CRIMES AND CRIMINAL PROCEDURE Part I Chapter 109 Section 2234, 2235, 2236
- ❖ Title 42, U.S.C., Section 14141 Pattern and Practice
- ❖ Fraud U.S.C., Title 18 Crimes and Criminal Procedure Part I Chapter 47 – Fraud and False Statements, Section 1001
- ❖ Official Misconduct Conspiracy Against Rights, 18 U.S.C. § 241

I am requesting the following relief:

For damages of the tortorius conduct of all defendants in depriving and conspiring to deprive me and my children of constitutional and civil rights under color of state and federal law in both civil and punitive damages, in amounts to be approved at time of trial. I am asking the courts to return my children into my care and custody without unnecessary delay.

Sincerely,



Scelia Robinson

May 6, 2013

JUDICIAL NOTICE

All officers of the court for Glynn County, Georgia are hereby placed on notice under authority of the supremacy and equal protection clauses of the United States Constitution and the common law authorities of *Haines v Kerner*, 404 U.S. 519, *Platsky v. C.I.A.* 953 F.2d. 25, and *Anastasoff v. United States*, 223 F.3d 898 (8th Cir. 2000) relying on *Willy v. Coastal Corp.*, 503 U.S. 131, 135 (1992), "*United States v. International Business Machines Corp.*, 517 U.S. 843, 856 (1996), quoting *Payne v. Tennessee*, 501 U.S. 808, 842 (1991) (Souter, J., concurring). *Trinsey v. Pagliaro*, D.C. Pa. 1964, 229 F. Supp. 647, *American Red Cross v. Community Blood Center of the Ozarks*, 257 F.3d 859 (8th Cir. 07/25/2001). In re *Haines*: pro se litigants are held to less stringent pleading standards than BAR registered attorneys. Regardless of the deficiencies in their pleadings, pro se litigants are entitled to the opportunity to submit evidence in support of their claims. In re *Platsky*: court errs if court dismisses the pro se litigant without instruction of how pleadings are deficient and how to repair pleadings. In re *Anastasoff*: litigants' constitutional rights are violated when courts depart from precedent where parties are similarly situated. All litigants have a constitutional right to have their claims adjudicated according the rule of precedent. See *Anastasoff v. United States*, 223 F.3d 898 (8th Cir. 2000). Statements of counsel, in their briefs or their arguments are not sufficient for a motion to dismiss or for summary judgment, *Trinsey v. Pagliaro*, D.C. Pa. 1964, 229 F. Supp. 647.

IV. RELIEF.

Grand jury investigation

State briefly and exactly what you want this court to do for you.

To grant an emergency injunctive relief,
 a cease & desist order & trial by jury -
 the court should grant to return my
 these requests due to children -
 - challenge the system & courts immediately
 - to provide meaningful cease & desist
 relief further the juvenile courts
 - to avoid irreparable injury of Glynne & its
 - I have no adequate remedies officials to stop
 to redress the harm my harassing me
 family & I will suffer - & have suffered
 Granting injunctive relief in this matter - does

I declare under penalty of perjury that the foregoing is true and correct.

serve the
PUBLIC
INTEREST

Signed this 6th day of May, 2013.

Name of Plaintiff:

Reverend Zack Lyde
 2509 Barrow St.
 BWR, GA 31520

Zack Lyde

Julie Robinson
 Signature of Plaintiff

PDB 60968
 Address
 Savannah, GA 31420

202-384-4427
 Phone Number